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February 27, 2025

**VIA ECF**

Honorable Jesse M. Furman  
Thurgood Marshall  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *In re Laundress Marketing and Product Liability Litigation*, No. 1:22-cv-10667  
*Macha v. The Laundress, LLC*, No. 1:24-cv-02108**

Dear Judge Furman,

I write on behalf of Defendant The Laundress, LLC (“The Laundress”) in the above-captioned action (“Action”) with respect to the matter styled as *Macha v. The Laundress, LLC*, No. 1:24-cv-02108-JMF. Pursuant to Rule 7.A of Your Honor’s Individual Rules and Practices in Civil Cases (“Individual Rules”), Defendant The Laundress, LLC (“The Laundress”) hereby seeks leave to file by ECF The Laundress’s Letter-Motion Seeking to Exclude Plaintiffs Olga Macha and Lauris Macs from the Deposition of A.S. (“Letter-Motion”) with certain confidential information sealed or redacted.

The parties may “without prior Court approval, redact from their public filings . . . medical records [including information regarding treatment and diagnosis], employment history, [and] individual financial information[.]” Individual Rules at 7.A.

Courts in this District routinely order documents containing sensitive medical information to be filed under seal. *See, e.g., Valentini v. Grp. Health Inc.*, 2020 WL 7646892, at \*2 (S.D.N.Y. Dec. 23, 2020); *McGuirk v. Swiss Re Fin. Servs. Corp.*, 2015 WL 13661685, at \*1 (S.D.N.Y. Mar. 30, 2015) (“Medical information is among the types of information often made subject to a sealing order.”).

The Laundress seeks to file in redacted form or under seal information that qualifies as Protected Health Information (“PHI”) of fourteen-year-old minor child, A.S., who is being deposed on March 10, 2025. In particular, the Letter-Motion and its attached exhibits, contain information related to A.S.’s medical records, including information related to diagnosis and treatment. An index listing all material that the parties seek to file in redacted form or under seal is attached as Exhibit A.

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Respectfully submitted,

s/ Ronald Y. Rothstein

Ronald Y. Rothstein

Given that A.S.'s health is central to Plaintiff's claims in this case, there is a strong argument that, at least as to some of what Defendant has proposed to redact or seal, the presumption in favor of public access outweighs the usual privacy interests inherent in medical information. That said, given that A.S. is a minor and this is only a discovery dispute, the Court will err on the side of caution and grant Defendant's motion to seal, subject to reconsideration in the event that anyone files a motion to unseal.

Plaintiffs shall file a response to Defendant's letter motion, not to exceed three pages, within three business days (that is, by the close of business on March 4, 2025).

The Clerk of Court is directed to terminate ECF Nos. 214 and 215.

SO ORDERED.

A handwritten signature in black ink, appearing to be "J. M. ...", is written over the text "SO ORDERED." and the date "February 28, 2025".

February 28, 2025